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**Before the
Federal Communications Commission
Washington, D.C. 20554**

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MAR 29 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of
Implementation of Section 26
of the Cable Television
Consumer Protection and
Competition Act of 1992
Inquiry into Sports
Programming Migration

PP Docket No. 93-21

To: The Commission

COMMENTS

National Broadcasting Company, Inc. ("NBC") hereby submits its comments in the Commission's inquiry into the existence and potential extent of migration of sports programming from broadcast television to subscription media. While the Commission's inquiry seeks information and opinion on a broad variety of topics, NBC will limit its policy discussion to the single aspect of the so-called sports migration issue that we believe justifies special public policy concern: the continued

the total amount of sports coverage without significantly depleting the supply of sports programming that is available on broadcast television. Multichannel subscription services have provided outlets for the transmission of certain sports events that would not be available otherwise. While a number of examples of specific sports events that have moved from broadcast to cable television might be cited, these should be viewed in the context of the overall increase in available sports programming. NBC has not observed a trend of significant net loss of college and professional sports event coverage from free, over-the-air broadcast media.

Any conclusions that are reached about possible sports migration should be based primarily on broad trends that are consistent from sport to sport, market to market, region to region, and year to year. The temptation to reach inductive conclusions that are based on narrow samples that may be anomalous, rather than trends that can be verified, should be avoided. Especially in making predictive conclusions, the Commission must be careful not to place undue reliance on any given example of possible migration, since a good deal of experimentation can be expected before a natural economic balance is found.

For example, at paragraph 16 of the Notice of Inquiry, FCC 93-77, released February 9, 1993 ("NOI") the Commission cites

"the decline in the last several years on the number of [Major League Baseball] games on national broadcast networks and the shift of games of individual teams (e.g. the New York Yankees) from a local television station to a regional cable network," as potential examples of sports migration. Yet the same paragraph acknowledges ESPN's recent decision not to extend its Major League Baseball ("MLB") contract beyond the current year. Before ESPN's announcement one might have concluded that MLB had migrated to national cable distribution. But recent press reports indicate that any conclusions about possible MLB migration to national cable distribution might be premature.

See, e.g., Broadcasting & Cable, March 15, 1993, "Fear of Falling Fees, Ratings Haunt MLB", pp. 42-44. Noting that MLB's current national broadcast (CBS) and cable television (ESPN) agreements are entering their fourth and final year, and that both CBS and ESPN have suffered substantial losses on those agreements, the Broadcasting and Cable article cites a sentiment that the baseball inventory is a buyer's market, with a sufficient number of games for both broadcast and cable.

Concerns about drawing conclusions from isolated examples validate the Commission's proposal to concentrate its analysis primarily on post season play and championship games. NOI at p. 6, para. 8. More importantly, the continued availability of post season play and championship games on free over-the-air television is a rational and substantial policy concern. Post

season and championship games are limited in number and are of substantial regional and national interest. The demand for those games is so high and the supply is so limited, that subscription

viewer demand from year to year, and this consistency can help temper the potentially misleading effects of anecdotal anomalies. The regular season is a market in which many games may be roughly fungible, so that in general, games carried by subscription rather than broadcast will be counterbalanced by others that are available for broadcast.³ The number of regular season games is so great that in most cases those games cannot reasonably be expected to be monopolized by subscription media.

The Commission's former anti-siphoning rules correctly distinguished between "non-specific" regular season games and "specific" playoff games. First Report and Order (Subscription TV Program Rules, 52 FCC 2d 1, 59 (1974) (subsequent history omitted). Though the Court of Appeals invalidated those rules on grounds that they were unsupported by the record, the court did endorse the Commission's distinction between specific and non-specific games. The court agreed in essence that official notice may be taken of the strong national interest in certain playoff and championship games:

³ As a practical matter, games of particular interest to a certain market will naturally find their widest audience and most efficient distribution on local broadcast media in most cases.

While we would be willing to concede that certain formats, such as the World Series, are sufficiently unique and popular that a factual inquiry into actual preferences might not be required, this would not seem to be the case with either feature films or "non-specific" sports events.

Home Box Office v. FCC, 567 F.2d 9, 40 RR 2d 283, 310 (D.C. Cir. 1977). The problem of sorting out anomalies from trends that plagues analysis of regular season "non-specific" games would not hamper the adoption of a policy that encourages the retention of post season and championship games on broadcast television. While an adequate record of the great public demand for such games and the lack of alternatives may easily be amassed, the Commission may also take official notice of these facts.

Of course, any governmentally mandated policy in this area should be narrowly tailored to ensuring the continued availability of playoff and championship games and adequate coverage of other important sports events on broadcast television. So long as that access is assured, there is no reason to deprive the public of additional enhancements that technology and multichannel capacity may permit, either on a subscription or pay-per-view basis.

NBC, in its unique position as broadcaster with interests in basic and pay cable sports networks, has already demonstrated that significant enhancements and expanded coverage of important

sports events can be offered on a pay basis without compromising the quality or extent of traditional free, over-the-air broadcast coverage. NBC's partnership in the Triplecast of the 1992 Olympics provided an unprecedented degree of coverage, giving viewers access to early rounds of competition and many events that did not command sufficiently broad interest to justify in-depth broadcast coverage. NBC's Triplecast succeeded in providing this expanded coverage without depriving the public of comprehensive broadcast network coverage, which was highly acclaimed. See, e.g., Broadcasting, August 3, 1992, p. 3, "Olympics Draw Viewers, Few Payers; NBC expected to lose minimum of \$30 million on Triplecast; ratings for broadcast portion are up; viewers praise coverage".

Though the 1992 Triplecast was not a financial success, revenue derived from successful broadcast/cable pay-per-view joint ventures and the economies of scale resulting from additional or supplemental coverage can subsidize and enhance the coverage available on free over-the-air television.

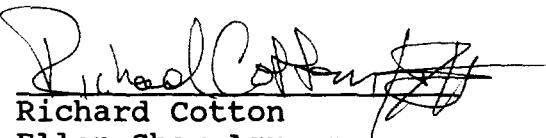
Conclusion

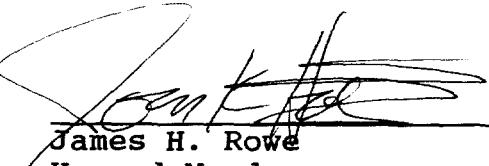
The continued availability of important playoff and championship games to all members of the public is an important and legitimate policy objective. Yet the limited supply of and great demand for these games make them particularly susceptible

subscription media. In contrast, there is an adequate supply of regular season games to meet the demands of both broadcasters and cable programmers. Therefore, NBC recommends that any policies governing distribution of sports programming be limited to ensuring the continued availability, to all members of the public, of playoff and championship games on free broadcast television.

Respectfully submitted,

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March 29, 1993

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Exhibit A

NBC Professional Football Broadcasts

**Regular Season and Playoff Games, 1980-1993
Super Bowls, 1980-1993 (All games)**

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NBC NFL Football (Cont'd) 1980

NTI

	DATE	TIME	AA RTG	AA MILES (000)	AA SN		TA RTG	TA MILES (000)	Shuttle	Carspace	Net
Hous-N.Y.J / Pitt-Buff	11/25	1-104	240.7	573							
OAK-Phila.			19.1	15,260	44		34.5	26,840	220	99	
Miami-P.T.O	11/30	1-402	18	252.8	627						
			14.0	11,190	34		25.9	20,150	207	81	
			19	273.8	661						
NYJ-LA / Cleve-Houston	11/30	4-02705	22.2	17,740	43		39.6	30,810	214	99	
			20	296.0	704						
Dallas-Dallas (Thanks)	11/27	4-711	19.3	15,420	49		34.5	26,840	-	217	99
JETS-Cleve	12/01	1-361	18.2	9750	30		26.2	20,380	217	99	
DET-KC			21	308.2	724						
SEATTLE-SD	12/13	4-7	SAT	13.3	10,620	31	29.8	23,180	-	215	99
ZHC-CINC/CLEVE-MINN	12/14	1-350	16.2	12,940	39		28.1	21,860	210	87	
			22	324.4	773						
OAK-DENVER	12/14	4-2706	18.5	14,790	37		34.9	27,150	215	99	
			23	342.9	910						
JETS-Dolphins	12/20	1-2-37	SAT	13.5	10,790	40	28.8	22,410	-	210	98
			2								
OAK-N.Y.G / CINC-CLEVE	12/21	1-411	15.4	16,300	36		31.1	24,200	214	99	
			24	358.3	846						

Playoffs

Houston-OAKLA	12/28	5-823	SUN	25.1	20,050	44		DNQ		216	99
San Diego-Buffalo	1/3	4-706	SAT	23.1	19,020	46		42.8	33,300	220	99
OAKLAND-Cleveland	1/4	4-2-350	SUN	29.2	23,330	61		44.9	31,930	220	99

Championship

SD-Diego-OAKLAND	1/11	5-820	SUN	31.5	25,170	49		51.0	39,650	219	99
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NBC NFL Football
1980 Season Average

NBC NFL FOOTBALL 1981

NTI

	DATE	TIME	AA ATE	AA HOURS (000)	AA SN		TA ATE	TA HOURS (000)		Shrines	Concourse	Net
<u>PRE SEASON</u>												
1.1	11SEAS vs Dallas	8/22 9-1231	13.7	10950	29		31.2	24,630		212	98	NBC
2.	ca Colours vs Phila	8/23 1-4:08	11.1	8870	36		25.8	20,610		209	98	NBC
	preseason average		12.4		33							
<u>REGULAR SEASON</u>												
		WEEK										
1	①	9/6 1-4:23	16.9	5620	24		18.2	14,830		202	81	
2	NYG-Buf / Hou-LA	9/6 4-7:06	14.0	11,410	39		29.5	24,040		201	9.8	
3			20.9									
4	②	9/13 1-4:12	9.5	7747	27		21.6	17,600		201	81	
5			30.4		90							
6		9/13 4-7:29	12.9	10,510	31		30.5	24,860?		215	99	
7			13.3		727							
8	NYG-Buff - Pitt, San-Jose Houston-Minne	③ 9/20 1-4:07	13.8	11,250	45		29.3	23,880		207	99	
9			57.1		166							
10	Hou-NY / Det-Buf / SD-Den	④ 9/27 1-4:18	15.0	12,230	40		31.1	25,350		217	9.7	
11			72.1		206							
12	K.C. - NE	⑤ 10/4 1-4:06	7.7	6280	20		18.3	14,910		202	81	N
13			79.8		226							
14	Det-Minn. / Cinc-L.A.	10/4 4-7:38	17.3	14,100	38		36.4	29,670		211	97	N
15			97.1		264							
16	NE-NY / Cleve-Pitt	⑥ 10/11 1-4:15	13.7	11,170	35		29.4	23,960		213	99	
17			110.8		299							
18	NY-NY - Pitt-Cin	⑦ 10/18 1-3:4	12.1	9860	29		27.6	22,470		216	9.9	N

NBC Football 1981

NTI

④	DATE	TIME	AA RTG	AA Homes (000)	AA SH	TA RTG	TA Homes (000)	Stations	Correlation	Net
ITT-Clear/ ^{100%} Cen - FF 1	11/22	1-4 10	12.5 17 218.4	10,190 544	30	25.5	20,780	208	81	IV
Louisville/Oak. ^{50%}	11/22	4-7	16.4	13,370	32	30.9	25,180	209	91	N

NBC 1982 Football

NFL

	DATE	TIME	AA RTG	AA Homes (000)	AA SH		TA RTG	TA Homes (000)	Stations	Coverage	Net	
<u>Pre Season</u>												
NYJ - Houston	8/22	12 ³⁰ -3 ²⁵ SUN	7.7	6280	25		19.4	15810	207	98	N	
SF - SD	8/23	9-12 ⁰⁶ SAT	11.9	9700	24		DNA		197	97	N	
NYJ - Miami	8/23	8-11 FCI	9.8	8160	20		23.5	19580	193	97	11	
Hou-Cin	#1	9/12 1-3 ⁵²	5.3	4410	14		13.7	11410	197	82	A	
McKinney NYJ / LA-SF	#2	9/12 4-7 ³⁰	14.5	12080	34		30.0	24990	213	99	N	
LA - at San Fran	Pitt	9/19 1-4 ³⁸	13.2	11,000	35		27.4	22820	211	99		
			3 33.0		83							
<u>Sept - Oct / Nov - Dec</u>												
Pitt - Hou/Seattle/atl	11/21	1-4 ¹⁸	13.6	11330	31		27.4	22820	215	99	N	
SC-NC/NE-carr			4 46.6		111							
LA-Cin	#1	11/28 1-4 ¹⁴	9.9	8250	23		22.1	18410	205	88	N	
Hou-N.Y. ear - out of season			5 56.5		137							
Denver/	#2	11/28 4-7 ⁰³	17.4	14,490	33		31.8	26490	211	92	N	
Pitt - SC-LA			6 73.9		110							
CIN	11/25	4-7 ¹⁸	THANKS GIVING	18.5	15410	47		33.1	27570	213	99	N
Hou	12/1	1-4 ⁰⁹	14.1	11750	33		29.0	24160	212	99	A	
SD	12/11	3 ⁰ -4 SAT	15.7	13080	34		32.0	26660	209	98	N	
Bills	12/12	1-4 ⁰⁵	13.4	11160	31		26.9	22410	208	83	N	
DC			8 101.4		234							
12/12 4-7 ¹⁷			15.6	12990	30		33.7	28070	209	95	N	
Oak			9 117		264							
12/18 12 ³⁰ -3 ¹⁷ SAT			13.4	11,160	39		27.0	22490	208	99	N	
PA												
E. P.	1-4 ¹⁷		12.4	10330	31		27.0	22490	202	90	N	
			10 129.4		205							
	706		15.1	12580	31		30.6	25491	218	97	N	

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NBC
NFL FOOTBALL
1983

	DATE	TIME		AM RTG.	AM Homes 000	AM SH		TM RTG.	TM Homes 000		STNS.	COU.	NET
PRE-SEASON:													
NEW ENGLAND-SAN FRANC.	8/14	4:00 7:21	SUN.	9.0	7500	23		22.9	19080		206	99	
PITTS-DALLAS	8/20	9:00 12:00	SAT.	10.3	8580	21		23.4	19490		202	97	
RAIDERS-CLEVELAND	8/26	8:00 11:27	FRI.	9.0	7500	17		DNA			198	97	
REGULAR SEASON:													
WEEK #1	9/4												
RAIDERS-Cinci, Pitts	#1	12:59 4:16		6.5	5450	19		15.5	12990		195	84	
DENVER													
SEATTLE-KANSAS City	#2	4:00 7:20		11.8	9880	31		26.8	22460		205	99	
				218.3		50							
WEEK #2	9/11												
DET-GREEN BAY	#1	1:00 3:53		8.4	7040	22		17.9	15,000		202	79	
				326.7		72							
SEATTLE-JETS, Houston	#2	4:00 7:13		13.3	11,150	29		30.4	25480		209	99	
RAIDERS				440.0		101							
WEEK #3	9/18												
C.-WASH., Pitts-Hous.		1:00 4:18		11.9	9970	30		25.9	21700		204	98	
				551.9		131							
WEEK #4	9/25												
NEW ENGLAND-Pitts		1:00 4:14		10.9	9130	28		23.3	19530		202	99	
				662.8		159							
WEEK #5	10/2												
RAIDERS-WASHINGTON	#1	1:00 4:21		10.6	8880	27		23.1	19360		203	89	
				773.4		186							
INDIANAPOLIS-MINNE	#2	4:00		12.0	10050	27		26.2	22040		212	97	

NBC
NFL FOOTBALL
1983

WEEK #9	DATE	TIME	MM RTG.	MM HOME 000	MM SH	TA RTG.	TA Homes 000	STNS.	COU.	NET
10/30		1:00	17	100	20	281	22550	710	00	

NBC NFL Football - 1983

Day	Date	Time	RTG	Sh	Dur		GR	GS		GR	GS	Dur	RTG	Sh
SUN	9/10	12:59-4:15	Game 1	6.5	19	196	1	12740	3724				196	
		4-7:20	Game 2	11.8	31	200	1	23600	6200	36340	9924	396	9.2	25
MON	9/11	1-3:53	Game 1	8.4	22	176	1	14784	3872	51124	13796	572	8.9	24
		4-7:13	Game 2	13.3	29	192	1	25536	5568	76660	14364	764	10.0	25
TUE	9/12	1-4:18		11.9	30	193	1	22967	5190	99627	25154	957	10.4	26
		4-7:14		10.9	28	188	1	20492	5264	120119	30418	1145	10.5	27
SUN	10/12	1-4:51	Game 1	10.6	27	199	1	21014	5313	141213	35791	1344	10.5	27
		4-7:14	Game 2	12.0	29	190	1	22800	5130	164013	40921	1534	10.7	27
MON	10/13	1-4:14	Game 1	16.2	31	194	0	23912	60740	187925	46997	1730	10.9	27
		4-7:19		12.6	31	201	1	25336	6231	213251	53228	1931	11.0	28
SUN	10/23	1-4:10	Game 1	8.8	20	190	1	16120	3800	281971	57028	2121	10.8	27
		4-7:13	Game 2	14.2	28	198	1	25216	4484	255217	62012	2299	11.1	27
SUN	10/29	1-4:14		12.9	30	194	1	25026	5970	280273	67832	2493	11.2	27
TUE	11/10	1-4:15	Game 1	10.7	24	197	1	21079	4728	301352	72560	2690	11.2	27
		4-7:05	Game 2	15.6	32	181	1	19700	5570	28056	78080	2874	11.5	27

NBC NFL Football

1984

	DATE	TIME		AM RTG.	HOMES (000)	SH		TA RTG.	HOMES (000)		STAS.	Cov.	NET
PRE - SEASON:													
NEW ENGLAND - WASH.	8/17	8:00 11:24	Friday Prime	6.8	5700	14		19.4	16,260		201	97	
Miami - L.A. RAIDERS	8/19	4:00 7:28	SUN	7.8	6540	20		18.6	15,590		198	93	
NY JETS - L.A. RAIDERS	8/24	9:00 12:22	Friday Prime	7.2	6030	15		DNA			202	98	
REGULAR SEASON:													
WEEK #1	9/2												
Miami - Washington	#1	12:58 4:00	182	7.3	6120	21		DNA			196	85	
JETS - COLTS / RAIDERS - Houst.	#2	4:27 7:44	.97	12.4	10,390	33		DNA			208	98	
WEEK #2	9/9			2)	19.7		54						
NEW ENGLAND - Mia / Den - Chi	#1	1:00 4:14		4.8	4080	13		13.4	11,380		194	75	
SAN DIEGO - SEATTLE	#2	4:19 7:36		12.8	10,870	29		28.2	23,940		208	99	
WEEK #3	9/16			4)	37.3		96						
CIN - Jet - / Hou - SD / RAID / KC		1:08 4:41		10.3	8740	28		24.3	20,630		206	99	
				5)	47.6		124						
WEEK #4	9/23												
JETS - Bills / Pitt - Cleve / Colts / Miami		1:00 4:15		10.0	8490	26		23.7	20,120		203	99	
				6)	57.6		150						
WEEK #5													
N.F. - JETS / RAID - DEN	9/30	4:00 4:14		11.8	10,020	29		25.1	21,310		208	99	
				7)	69.4		179						
WEEK #6	10/7												
N.Y. JETS - K.C.	#1	1:00 4:08		9.0	7640	22		19.2	16,300		203	88	

NBC NFL Football

1984

	DATE	TIME		AM RTG.	HOMES (000)	SH	TA RTG.	HOMES (000)		STNS	Cov.	NET
				12)	124.6	305						
WEEK # 9												
Jet-N.E./Den-Bron.	10/28	4:00 7:51			13.8	11,720	27	31.3	26,570	212	99	
				13)	138.4	332						
WEEK # 10	11/4											
Raiders-Chicago	#1	1:00 4:10			9.8	8,320	23	21.3	18,080	198	84	
				14)	148.2	355						
Miami-Jets/N.E.-Denver	#2	4:12 7:24			18.0	15,280	35	34.0	28,870	209	99	
				15)	166.2	390						
WEEK # 11	11/11											
Colts-Jets/Denver-S.D.		1:00 4:15			12.2	10,320	28	26.3	22,330	209	99	
				16)	178.4	418						
WEEK # 12	11/18											
Seattle-Cincinnati	#1	1:00 4:12			8.2	6,960	19	19.1	16,220	197	77	
				17)	186.6	437						
Jets-Houston/Mia-S.D.	#2	7:27 7:24			18.1	15,370	33	34.3	29,120	206	98	
				18)	204.7	470						
THANKSGIVING	11/22											
NEW England-Tallas		4:00 7:35	THANK		19.0	16,130	46	33.2	28,190	214	99	
WEEK # 13	12/5											
K.C-Giants/SEA-Ten.		1:00 4:14			14.4	12,230	35	29.2	24,790	210	99	
				19)	219.1	505						
WEEK # 14	12/12											
Denver-K.C	#1	1:00 4:21			8.1	6,880	18	19.0	16,130	202	81	
				20)	227.2	523						
Raiders-M.M.	#2	4:21 7:47			20.9	17,740	37	38.2	32,430	210	98	
				21)	248.1	560						
WEEK # 15												
BUFFALO-Jets	12/8	12:30 3:42	SAT		8.3	7,050	26	22.1	18,760	198	98	
SAN Diego-Denver/SEA-K.C	12/9	1:00 4:12			12.6	10,700	30	26.8	22,750	209	99	
				22)	260.7	590						
WEEK # 16												
DENVER-SEATTLE	12/15	4:00 7:05	SAT		15.1	12,820	33	31.3	26,570	214	99	
	12/16											
E-Tampa/BUFF-Cin	#1	1:00 4:24			5.2	4,410	12	16.7	14,180	198	89	
				23)	265.9	602						
JETS-Raid/K.C-SanJ	#2	4:27 7:10			18.2	15,450	36	33.9	28,780	211	99	
				24)	284.1	638						

NBC NFL FOOTBALL - 1984

Day	Date	Time		RTG	Sh	Dur		GR	GS		GR	GS	Dur	RTG	Sh
SUN	9/2	12584	GM1	7.3	21	190		13870	3990		38298	10491	387	9.9	27
SUN	9/2	422-744	GM2	12.4	33	197		24428	6501		47562	13000	580	8.2	22
SUN	9/9	1-414	GM1	4.8	13	193		9264	2509		71448	18423	767	9.3	24
SUN	9/9	419-736	GM2	12.8	29	187		73936	5423		93677	20747	975	9.5	25
SUN	9/16	7-111		10.3	22	208		211511	0211						

NBC
NFL Football
1985

Date	Time	Team	Home/Away	Score	Team	Time	Home/Away	Score
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NBC
NFL Football
1985

	DATE	TIME		AM RTG.	Homes (000)	SH		PM RTG.	Homes (000)		STNS.	Cov.	NET
				(12)	143.7		336						
WEEK # 9	11/3												
MIA-N.E./Clev-Pitts	#1	4:00 4:08		10.5	9,020	25		21.3	18,300		197	81	
				(13)	154.2		361						
Jets-Indy/Raid-SEA	#2	7:12 7:36		13.8	11,850	26		32.3	27,660		212	99	
				(14)	168		387						
WEEK # 10	11/10												
Jets-Miami/Raid-S.D.		4:00 4:21		13.4	11,510	25		30.2	25,940		201	99	
				(15)	181.4		412						
WEEK # 11	11/17												
MIA-Indianapolis	#1	4:00 4:14		6.6	5,670	15		17.0	14,600		197	81	
				(16)	188		427						
N.E.-SEA/S.D.-Den.	#2	4:19 7:20		16.6	14,260	32		34.0	29,210		211	98	
				(17)	204.6		459						
WEEK # 12	11/24												
N.E.-Jets/Ten-Raid		11:00 4:42pm		14.0	12,030	31		29.6	25,430		208	99	
				(18)	212.6		490						
WEEK # 13	11/28												
Jets-Detroit		12:32 3:44	Thanks	18.7	16,060	45		34.1	29,290		206	96	
Cleveland-Giants	12/1	1:00 4:20		14.9	12,800	33		33.6	28,860		208	99	
				(19)	233.5		523						
WEEK # 14	12/8												
Jets-Buffalo/Indy-Chi	#1	4:00 4:16		12.1	10,390	28		25.4	21,820		196	92	
				(20)	245.6		551						
RAIDERS-DENVER	#2	4:22 7:21		18.5	15,890	35		35.5	30,440		212	99	
				(21)	264.1		586						
WEEK # 15	12/14												
KANSAS-CITY-Denver		4:00 7:24	SAT	12.4	10,650	28		27.3	23,450		210	99	
				(22)	250.5		586						